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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 12-0486 WHA
)	
Plaintiff,)	
)	STIPULATION TO SCHEDULE STATUS
v.)	CONFERENCE AND TO EXCLUDE TIME
)	UNDER SPEEDY TRIAL ACT AND
JOHN KIERAN HYNES,)	Proposed ORDER THEREON
)	
Defendant.)	

For the reason that defendant's counsel requires reasonable time to review extensive discovery already produced in this matter, to prepare this material for trial, and to prepare witnesses for trial, it is hereby stipulated by and between Plaintiff, the United States of America, and Defendant, John Kiernan Hynes, through their respective counsel, as follows:

1. That a status conference in this matter be scheduled for November 13, 2012, at 2:00 p.m;
 and

2. That the period of delay from September 18, 2012, to November 13, 2012, shall be excluded pursuant to 18 U. S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) as the ends of justice served by this exclusion allowing for continuity of counsel, ongoing discovery production and review,

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1 and for adequate trial preparation in this matter outweigh the best interest of the public and the
2 Defendant in a speedy trial.

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4 MELINDA HAAG
United States Attorney

5
6 /s/
7 JOHN M. YOUNGQUIST
Attorney for John Keiran Hynes

8 /s/
9 THOMAS MOORE
Assistant United States Attorney
Chief, Tax Division

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11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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13 Dated: September 19, 2012.

